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13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 LEVELS NETWORK, INC., a Delaware
16 corporation; and AW BETEILIGUNGS
17 GMBH, a limited liability company organized
18 under the laws of Germany,

19 Case Number:
20 2:21-CV-01796-RFB-BNW

21 Plaintiffs,

22 vs.
23 **STIPULATION AND ORDER TO STAY**
24 **DISCOVERY AND OTHER**
25 **DEADLINES PENDING SETTLEMENT**
26 **DISCUSSIONS**

27 JONAS FREY, an individual,

28 **(FIRST REQUEST)**

15 Defendant.

16 Defendant Jonas Frey, by and through his counsel, Marquis Aurbach, and Plaintiffs
17 Levels Network, Inc. and AW Beteiligungs GmbH, by and through their counsel of record,
18 Holley Driggs, Ltd. and Wuersch & Gering LLP (collectively the “Parties”), hereby stipulate
19 and agree to stay discovery for thirty (30) days in the above-referenced matter. This
20 Stipulation is being entered in good faith and not for purposes of delay.

21 1. During recent communication regarding upcoming discovery deadlines, the
22 Parties determined that this matter may be appropriate for possible resolution and that a stay
23 of discovery and other deadlines would allow the Parties to explore the possibility of
24 settlement, without incurring the time and expense of ongoing discovery and other work
25 during settlement discussions.

26 2. The Parties agree that all deadlines in this matter be stayed for a thirty (30) day
27 period as of the date hereof.

1 3. The Parties further agree that within five (5) days after completion of the
 2 contemplated settlement discussions, if not successful, the Parties will submit a stipulated
 3 schedule regarding any pending motions or discovery which will extend all applicable dates
 4 for the commensurate time period that they were stayed in accordance with Rule 26 of the
 5 Federal Rules of Civil Procedure and Rule 26-1 of the Local Rules of the United States District
 6 Court, for the Court's approval.

7 4. The Parties further agree that if any Party determines that the settlement
 8 discussions have become futile prior to the end of the stay, that party may unilaterally notify
 9 the other party and within (5) days after such notice, the Parties will submit a stipulated
 10 schedule regarding any pending motions or discovery which will extend all applicable dates
 11 for the commensurate time period that they were stayed in accordance with Rule 26 of the
 12 Federal Rules of Civil Procedure and Rule 26-1 of the Local Rules of the United States District
 13 Court, for the Court's approval.

14 5. Accordingly, the Parties hereby agree and request the Court to enter a stay of
 15 all deadlines in the instant case.

16 6. This is the Parties' first request for a stay of deadlines in this matter.

17 7. Notwithstanding the stay, the Parties intend to and hereby agree to cooperate
 18 in the exchange of information as needed to facilitate settlement.

19 8. The Parties both submit that the instant stipulation is being offered in good
 20 faith and not for the purpose of delay.

21 IT IS SO STIPULATED this 29th day of August, 2022.

22 MARQUIS AURBACH

23 HOLLEY DRIGGS

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2 Levels Network, et al. v. Frey
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8 **ORDER**
9 **IT IS SO ORDERED**

10 **DATED:** 12:24 pm, August 31, 2022

11 

12 **BRENDA WEKSLER**
13 **UNITED STATES MAGISTRATE JUDGE**

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